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DEPARTMENT OF TRANSPORTATION

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February 11, 1991

DOCKET SECTION

Docket Clerk
U.S. Department of Transportation
Room 4107
Docket Number 47383
407th Street S.W.
Washington, D.C. 20590

Re: Passenger Manifests -- International Flights

Dear Sirs:

In response to a request in "TRAVEL WEEKLY" on Monday, February 11th soliciting comments from the Travel Trade Industry in reference to the above I wish to convey me observations and recommendations to your office.

Having served as Travel Consultant and Branch Manager for two large travel agencies., I wish to submit the following insights based on my 6 years in the travel industry:

A) Require the Travel Agent and/or the Airline Reservation Agent to input 1) the full passenger name, 2) phone number of an emergency contact person and 3) the passengers passport number for International flights departing from and arriving to the United States.

*** DO NOT hold the Travel Agent/Airline Reservations agent liable if they are unable to obtain all of the above data, Oftentimes the customer will not have all of the pertinent information at the time the reservation is made, or the customer may not be certain that they will actually be travelling on the reservation being made (double bookings are far too common from the public), or a customer may not wish to give a contact phone number for privacy/personal incognito reasons.

B) DO REQUIRE the check-in agent of the International flight OR the origin domestic flight which will connect to the customers' International flight to ascertain and assure that the above information is contained in the passengers reservation.

C) If the customer refuses to leave an emergency contact number, the customer must waive this right by signing or initialling some sort of document prior to boarding (i.e. the passengers flight coupon, or airline portion of boarding pass, or some sort of flight manifest list).

D) As International passengers must present their Passports to the check-in agent, it can at that time be easily verified that the passport being presented matches the passport number in the reservation OR any discrepancy can be resolved.

E) As my customers' concerns for International travel are currently heightened, it would make little sense to require just U.S. Citizens to adhere to the above procedures. In my view, ALL passengers, irregardless of nationality should at the very least have the passport numbers reflected in the manifest.

D.O.T. could randomly request flight manifests from all carriers flying to and from the United States to ensure compliance. As computer programming costs would undoubtedly arise, a long phase-in time would be needed, especially for those third-world foreign carriers which currently have unsophisticated computer reservation systems.

F) It would be unexcusable to require only U.S. Airlines to follow the above procedure, or even parts of the above procedure. For a foreign flag carrier, it would have to be looked at as a cost of doing business into the U.S. market.

Frankly, since the Lockerbie catastrophe, most of my European bound passengers are flying British Airways and Lufthansa. But, I have heard numerous reports from my customers that the foreign airlines Security to and from the United States is not as rigorous as T.W.A., American, or even Pan Am. Unfortunately, our own U.S. Citizens have a perception that the foreign carriers are safer to fly.

Sadly for U.S. Airlines, over 65% of my European business is now on Foreign Flag carriers, and over 40% of my Pacific business is on the Foreign Flags. If you can not enforce all International carriers to these procedures, you should not bother doing anything at all.

As I try to support U.S. Industry it is discouraging to see the trend in the last couple of years.

G) I do not feel these requirements should be imposed on solely Domestic flights. With the prevalence of Advanced Boarding Passes and Double, even Triple booking, the majority of my corporate travelers do not even come into contact with airline check-in staff. They go straight to the gate if no checked bags. The procedures would be un-enforceable. Voluntary phone contact numbers as currently provided today is adequate. Even in light of the USAir crash at LAX a week ago where passenger manifests were slow to be released, we can not grind our domestic air transport system to a halt for a statistically remote occurrence.

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H) On other security matters, as mentioned above I would mandate that ALL carriers, both U.S. and Foreign Flag be required to conform to the same set of security standards both within the United States and Abroad. If the D.O.T. is wanting to protect our U.S. Citizens, you seem to have forgotten that at the moment, most of our U.S. Citizens are selecting the Foreign Flags!!

Thank you for taking the time to consider my comments. Nothing that I have presented is radical or new, merely based on common sense. I will look forward to seeing what arises from your review and trust that it will be in the best interest of the traveling public.

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